## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE

SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC.,	§ §
Plaintiffs,	§ §
v.	§ §
Broadcom Inc. Brocade Communications Systems LLC Extreme Networks, Inc.	§ <u>Jury Trial Demanded</u> § § §
Defendants.	§

## MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Comes now Plaintiff SNMP Research, Inc. by and through counsel, and pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, and this Court's Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], seeks leave of this Court to submit certain documents under seal and/or in redacted form as indicated below.

Plaintiff moves for leave to file Exhibit A to the Declaration of Olivia Weber in Support of Plaintiff's Motion to Compel Discovery Responses from Defendants Broadcom Inc. and Brocade Communications Systems LLC ("Weber Declaration") under seal because Defendants designated it confidential.

Plaintiff moves for leave to file a portion of Exhibit B to the Weber Declaration under seal, which contains Plaintiff's commercially sensitive, confidential pricing term on page 18 of the draft license agreement. *See Moore v. Westgate Resorts*, Ltd., 2020 WL 7017738, at \*1-3 (E.D. Tenn. May 22, 2020).

Plaintiff moves for leave to file Exhibit I and L to the Weber Declaration under seal because Defendants designated those documents confidential in their entirety.

Other than Plaintiff's request to seal Plaintiff's sole pricing term on page 18 of Exhibit B, Plaintiff does not support this Motion because the information contained in each of the foregoing items does not appear to meet the standard for sealing specified in the Court's Order. However, because Defendants have marked Exhibits A, I, and L confidential, Plaintiff presents this Motion to the Court.

As required by the Memorandum and Order Regarding Sealing Confidential Information, the unredacted versions of the documents referenced herein are provided as exhibits to this Motion and where only a portion of the document is redacted, that portion of each document is highlighted.

## Respectfully submitted this 9th day of December, 2021.

/s/ John L. Wood

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